

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF SCOTT ROY BELOTEN

I, Scott Roy Beloten, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. At the time of the terrorist attacks of September 11, 2001, I worked as a paramedic in the ambulance department at Maimonides Medical Center. I had been employed with Maimonides Medical Center since May 11, 1998. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment with Maimonides Medical Center during the 9/11 terrorist attacks.

4. On the morning of September 11th, I was on duty as a paramedic at Maimonides Medical Center when my unit was called to respond to the World Trade Center (WTC) area shortly after the second passenger jet, hijacked and piloted by terrorists, plunged into the South Tower.

5. When I arrived at the WTC area with my fellow paramedics, I encountered a chaotic and horrific scene. People around me were screaming and crying for help, and they were running to escape the falling debris from the South Tower. I witnessed people jumping from both towers and plunging to their deaths. Some of these victims landed within close proximity to my position. The scene was like a war zone, and I saw body parts everywhere.

6. Just before entering the Marriott building at the WTC to render aid to the injured, I looked up to avoid jumpers from the South Tower. I saw a piece of sheet metal debris falling towards me. I put my arms up to shield my body from the falling metal debris. The sheet metal debris slammed into my body, and it struck me in the neck, left forearm, and my right-hand. I received multiple lacerations to my hands and fingers from the falling sheet metal.

7. Shortly after I entered the Marriott building, I became buried under the falling debris from the South Tower collapsing onto the Marriott. I further injuring both of my hands, wrists, arms, and left knee while running from a massive debris cloud that rained down upon me. I slammed my left knee into a marble planter while trying to cover my body from the flying debris. I became engulfed in a thick cloud of smoke, chemicals, and building debris. I inhaled massive quantities of these substances into my lungs and airways, and my eyes and throat began to burn from the exposure to these harmful substances in the air.

8. Due to the continued falling debris around me, I decided to evacuate the Marriott building, and I encouraged others around me to exit the building as well.

9. After I exited the Marriott, I helped an injured emergency medical technician (EMT) to safety. I and other paramedics brought this EMT by the North Tower so that we could get equipment out of ambulances that had not been crushed yet. While rendering aid, the North Tower collapsed upon me. Another massive debris cloud rained down upon me, and I became engulfed in a thick cloud of smoke,

chemicals, and building debris. I inhaled massive quantities of these substances into my lungs and airways, and my eyes and throat continued to burn from the exposure to these harmful substances in the air. During these events, we brought the injured EMT to a triage area for her to be transported to the hospital.

10. Despite my injuries and the chaos around me, I continued to perform my duties by helping injured people move to a triage area near Ground Zero for several hours after the collapse of the South and North Towers.

11. Later that afternoon, I received initial treatment for my various injuries at St. Vincent's Hospital. I received several stitches in the fingers on my right hand due to the lacerations I received from the falling debris at the WTC. Further, in the months and years after the 9/11 attacks, I continued to suffer from several physical injuries, including the need for surgical intervention with my right and left wrists and my left knee.

12. Specifically, as a result of these terrorist attacks, I suffered the following injuries¹ on September 11, 2001: injuries to my hands and wrists that resulted in stitches in the fingers on my right hand, three surgeries to repair my right wrist, and another surgery to repair my left wrist². Both of my hands are now significantly deformed and I am unable to use them due to the significant loss of my fine motor skills. As discussed above, I also suffered injuries to both knees which resulted in arthroscopic knee surgery to repair a torn meniscus in my left knee³. Due to the large quantities of dust, smoke⁴, chemicals, toxins, and building debris that I inhaled during the above events, I further developed a chronic

¹ See, 9/11 Injury Records of Scott Roy Beloten (BELOTEN_MEDS_0001), attached hereto as Exhibit C, at 0001-0052.

² *Id.* at 0002-0004, 0006-0008, 0011, 0013, 0016-0017, 0019-0020, 0025, 0028-0030, 0033-0034, 0036, 0045-0048.

³ *Id.* at 0013, 0023-0027, 0032, and 0035-0038.

⁴ *Id.* at 0005, and 0010-0012.

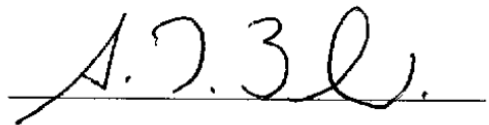
cough⁵, reactive airway dysfunction syndrome⁶, asthma⁷, bronchitis⁸, rhino sinusitis⁹, gastroesophageal reflux disease (GERD)¹⁰, as well as dyspnea¹¹. Lastly, due to the horrific events that I experienced on 9/11, my doctors further diagnosed me with post-traumatic stress disorder¹². Many of my physical and emotional injuries and conditions from 9/11 have also been confirmed by the World Trade Center Health Program¹³.

13. I sought and continue to seek medical attention for my physical and emotional injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant records confirming my physical and emotional injuries following the September 11, 2001, terrorist attacks.

14. I previously pursued a claim (VCF 212-003998) through the September 11th Victim Compensation Fund (VCF) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 17 day of August 2023.

A handwritten signature in black ink, appearing to read "A. J. 3. L.", written over a horizontal line.

Declarant Scott Roy Beloten

⁵ *Id.* at 0021, 0041, and 0043.

⁶ *Id.* at 0021-0022, 0041, 0044, and 0052.

⁷ *Id.* at 0039, 0044, 0049-0052.

⁸ *Id.* at 0039.

⁹ *Id.* at 0041, and 0050-0052.

¹⁰ *Id.* at 0039-0041, and 0043-0044, 0049-0052.

¹¹ *Id.* at 0021-0022, and 0043.

¹² *Id.* at 0009-0010, 0012, 0014-0015, 0018-0020, 0022, 0041-0042, and 0049-0052.

¹³ *Id.* at 0052.

**EXHIBITS
FILED
UNDER SEAL
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5716)**